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William H. BuRoss, III
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August 8, 1995

RECEIVED

AUG 8 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY


Re: MM Docket No. 95-74
Amendment of Section 73.202(b)
FM Table of Allotments
(Benavides and Bruni, Texas)

Dear Mr. Caton:

Transmitted herewith, on behalf of Benavides Communications, petitioner in the above-referenced rule making proceeding, is an original and four (4) copies of its Reply Comments in the above-referenced rule making.

Should questions arise concerning this filing, please communicate with this office.

Sincerely,


Lee J. Peltzman
Counsel for

BENAVIDES COMMUNICATIONS

Enclosure

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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AUG 8 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:

Amendment of Section 73.202(b)
FM Table of Allotments
(Benavides and Bruni, Texas)

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MM DOCKET NO. 95-74
RM-8579

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

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REPLY COMMENTS

Benavides Communications ("BC" or "petitioner"), permittee of Station KXTM(FM), Benavides, Texas, by its attorney, hereby respectfully files its Reply Comments in the above-captioned rule making. In support of its position, BC states as follows:

By Notice of Proposed Rule Making, DA 95-1145, released June 1, 1995 ("NPRM"), the Commission proposed to amend its Table of Allotments to reallocate Channel 299C2 from Benavides to Bruni pursuant to Section 1.420(i) of the Commission's rules and also to allot Channel 254A to Benavides, Texas, as a new replacement channel. The NPRM additionally proposed the concurrent modification of Station KXTM(FM)'s construction permit to specify Bruni as the station's community of license.

Comments in support of the Commission proposal were filed by BC establishing that Bruni had sufficient social, economic, cultural, and governmental indicia to qualify as a "community" for Commission allotment purposes and that the proposed change of community would serve the public interest. Additional Comments were filed by Withers Broadcasting Company of Texas ("Withers"), Sound Investments Limited, Inc. ("Sound Investments"), Miguel A. Villarreal, Jr. ("Villarreal"), and Cosmopolitan Enterprises of Victoria, Inc. ("Cosmopolitan").

Sound Investment, Withers, Cosmopolitan, and Villarreal all contend that Bruni is not deserving of an allotment.

Villarreal and Sounds Investment contend that BC's intent allegedly is to become a Laredo, Texas, station. Cosmopolitan states that Bruni is too small a community to warrant a Class C2 allotment. Withers "offers no particular comment with respect to the wisdom of allotting any channel..." to Bruni, then questions whether Bruni may qualify as a "community" for allotment purposes because of its population.^{1/} Sound Investments also contends that Bruni lacks the necessary indicia required by the Commission to support a finding that it is a "community" for allotment purposes.^{2/}

Summarizing the positions of these parties with respect to the reallocation of Channel 299C2 to Bruni, their main contentions are that (1) BC intends to be a Laredo rather than a Bruni station, and (2) Bruni does not have necessary indicia and population to support a finding that it is a "community" for allotment purposes and thereby receive its own broadcast station. Both of these arguments are factually deficient and misapply the law.

Contrary to the supposition of Villarreal and Sound Investments, it is not BC's intent to serve Laredo at the expense of the community of Bruni, or, for that matter, to serve Laredo at all. In fact, it is impossible for BC to serve Laredo. Sound Investments, itself, points out that Bruni is located 64 km (almost 40 miles) from Laredo. that no transmitter site can be located west of Bruni in the direction of Laredo and that it would be impossible to install a booster in

^{1/} Withers Broadcasting Company of Texas, Comments, filed July 24, 1995, p. 1.

^{2/} Both Cosmopolitan and Sound Investments have submitted counterproposals, however, the Commission has not yet accepted those counterproposals and, therefore, BC will not comment on them at this time.

Laredo to improve service to that community, since such would create an interference conflict with a Mexican allotment.^{3/} Moreover, as may be observed from a review of the engineering submitted as an attachment to BC's Comments, filed July 24, 1995, the 60 dBu contour for the proposed Bruni facility barely approaches Laredo, much less covers any portion of that community. Thus, BC does not intend and could not succeed in being a Laredo station because of the distance of its transmitter site from Laredo. Bruni is not within the Laredo urbanized area. It is an independent rural community with its own distinct needs and interests. Those needs and interests are not being adequately addressed by Laredo broadcast stations.^{4/}

While Bruni, admittedly, is a community which has a relatively small population, such has not precluded the allotment of a channel previously in Commission rule makings. Thus, in Marion and Orrville, Alabama, 6 FCC Rcd. 3042 (1991), the Commission approved the reallocation of a facility from a community of 4,467 to one with a population of 349, even smaller than Bruni. Nor is this the only case where the Commission reallocated a channel from

^{3/} Sound Investments Unlimited, Inc., Comments and Counterproposal, filed July 24, 1995, p. 2.

^{4/} Sound Investments points out that BC may serve Bruni from KXTM(FM)'s current authorized Benavides site. However, the Commission has previously noted that it is a licensee's primary obligation to serve the needs and interests of the community to which it is licensed. See Camden, Arkansas, et al., DA 95-1391, released June 29, 1995. See also Section 73.1120 of the Commission's rules. BC is aware of its obligation and fully intends to provide programming designed to meet the local needs and interests of the Bruni community. Its station will broadcast local church services every Sunday from 6:00 a.m. to 12:00 noon as a public service. The station will also broadcast Bruni Middle School and High School athletic events as well as other school events. Public service announcements addressing local concerns will be broadcast throughout the day. An hourly newscast dealing with local news will be broadcast throughout the day and a weekly program dealing with matters of concern to Bruni residents will also be broadcast.

a larger to a much smaller community.^{5/} See e.g. Camden, Arkansas, supra (channel reallocated from community of 15,356 to a community of 632); Midway, Florida, et al., DA 95-1221, released June 9, 1995 (channel reallocated from a community of 7,444 to a community of 852); Kindred and Oakes, North Dakota, 7 FCC Rcd. 1996 (1992) (channel reallocated from a community of 2,030 to a community of 569); Callahan, Florida, and St. Marys, Georgia, 6 FCC Rcd. 7564 (1991) (channel reallocated from a community of 3,596 to a community of 869); New Bern and Oriental, North Carolina, 6 FCC Rcd. 5309 (1991) (channel reallocated from a community of 17,363 to a community of 784); Holly Springs and Byhalia, Mississippi, 6 FCC Rcd. 4305 (1991) (channel reallocated from a community of 7,283 to a community of 757).

Further, Bruni possesses the requisite indicia that the Commission has recognized as characteristic of a community for allotment purposes. To begin with, the fact that Bruni relies on Webb County for some of its local services does not negate the fact that it is a separate community for allotment purposes. The Commission has stated that a municipality need not provide every public service on its own in order to merit community status. See Hannahs Mill, Georgia, et al., 6 FCC Rcd. 3753, 3754 (1991).

BC demonstrated in its Comments that Bruni possesses the necessary social, economic, and cultural components which serve as indicia of community status. Bruni has a middle school and high school. While law enforcement is provided through Webb County Sheriff's office, there is a substation in Bruni which contains a Justice of the Peace and Sheriff's office. See Exhibit

^{5/} Villarreal attempts to make much of the fact that Benavides, with a population of 1,978, is several times as large as Bruni. However, the above-cited cases illustrate that such is not a problem. The community of New Bern was over 20 times as large as Oriental. Camden was 25 times as large as East Camden, and Marion was 12 times as large as Orrville.

1 (Statement of Justice of the Peace Alfredo Garcia, Jr.). Bruni possesses its own voluntary fire department. The city is building an Athletic and Fine Arts Facility. Electric service is provided by a branch office of Medina Electric Coop and water service is provided through Bruni Rural Water Supply Company.

There are two churches located in Bruni: Sacred Heart Church and First United Methodist Church. The community has its own Post Office and zip code as well as its own telephone exchange (747). See BC Comments, Exhibit E.

Moreover, importantly, it is clear that the residents of Bruni function as and conceive of themselves as residents of a community around which their interests clearly coalesce. Attached hereto is a Petition containing the names of over 120 residents of Bruni attesting to the fact that these individuals view themselves as residents of an independent community, having separate problems and interests and deserving of its own radio facility (Exhibit 2). The testimony of these local residents demonstrates that Bruni is viewed as a community by those people who know it best. See also Statement of life-long Bruni resident Irene Solano (Exhibit 3).

The public interest will be served by the reallocation of Channel 299C2 from Benavides to Bruni and the concurrent modification of Station KXTM(FM)'s construction permit to specify Bruni as that station's community of license as well as the allotment of Channel 254A to Benavides, Texas, as a replacement channel. This arrangement will provide the community of Bruni with its first local aural transmission service, thereby resulting in a preferential arrangement of allotments pursuant to the Commission's change of community procedures. See Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd. 4879 (1989), recon. granted in part, 5 FCC Rcd. 7094 (1990). As noted, Bruni is an independent

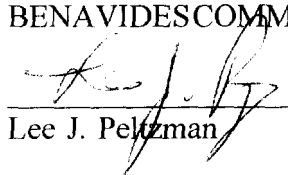
community with its own needs and interests. Modifying Station KXTM(FM)'s authorization to specify Bruni will not cause any disruption to existing service in Benavides since that station has never been on the air. See Midway, Florida, et al., supra, at para. 6. Additionally, while removal of Station KXTM(FM) from Benavides will crease a reception service loss area, the entire loss area would continue to receive at least five full-time reception services, even if another channel were not reallocated to Benavides. The Commission previously has considered this to constitute adequate service. Midway, Florida, supra; Oshkosh, Wisconsin, et al., 10 FCC Rcd 2085 (1995); Calabash and Tabor City, North Carolina, 9 FCC Rcd. 7857 (1994).

BC requests that the Commission reallocate Channel 299C2 from Benavides to Bruni, concurrently modify the authorization previously issued to Station KXTM(FM), and allot a new Channel 254A at Benavides, Texas. BC will file an application for modification of its permit to implement the reallocation to Bruni, as well as file an application for a new construction permit at Benavides, Texas,^{6/} and will, upon Commission grant of its applications, immediately construct and operate both Station KXTM(FM) on Channel 299C2 at Bruni, as well as its Benavides station.

Respectfully submitted,

BENAVIDES COMMUNICATIONS

By:


Lee J. Peltzman

SHAINIS & PELTZMAN
2000 L Street, N. W. - #200
Washington, D. C. 20036
August 8, 1995

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^{6/} As noted in its Comments, in the event that the Commission allots an alternative channel to Benavides, BC will apply for that channel and, once the Commission has granted its application, construct and operate its station.

EXHIBIT 1

August 2, 1995

Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Dear Sir/Madam:

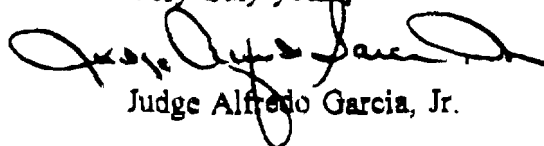
I am writing this letter with respect to the proposal to bring a radio station to the community of Bruni, Texas. I am a Justice of the Peace and work at a Bruni Substation.

In my opinion, the community of Bruni deserves a radio station. Although relatively small in population, the community of Bruni is a vibrant, enthusiastic one. Our community is growing at a fast rate. Bruni High School is one of the best in the state. Students attend from the fifth grade through the 12th grade. The community of Bruni also has one of the finest votech programs in the state. We also have a high school and junior high school band program that now has 180 members.

The community of Bruni has two churches located within the city limits. We also have a volunteer fire department and a Lions Club. We are in the process of setting up an ambulance service to be located in the community. We are also in the process of setting up a Knights of Columbus.

I believe strongly that a radio station licensed to Bruni would boost the economic welfare of the community and help our schools, churches, social organizations, and businesses plus elevate the morale and enthusiasm of residents of the community.

Very truly yours,



Judge Alfredo Garcia, Jr.

ENWILPERUNJAG

EXHIBIT 2

P E T I T I O N

The purpose of this Petition is to advise the Federal Communications Commission of the importance of authorizing a broadcast station to the community of Bruni, Texas. We consider ourselves residents of Bruni. We live and work in Bruni. We shop at Bruni businesses. Our children presently attend or have attended Bruni High School. We worship at Bruni churches. We take part in community organizations such as the Lion's Club. We receive mail from a Bruni Post Office, and have our own Bruni zip code.

We not only live in Bruni, but we function as a single community. There is no question but that as residents of the community of Bruni, our common problems, needs and interests are not adequately addressed by stations located in other communities. There is a very real need for a community station to serve the separate problems and interests of the residents of the community of Bruni.

Address:

P.O. Box 156 78344 Bruni, Tx

P.O. Box 31 78344 Bruni Tx

~~Zenon A Perez~~

Box 54 78344

Box 54 - Bruni, Tx 78344

P.O. Box 103

~~P.O. Box 103~~

Name:

~~Mark Herrera~~

Pablo Vela

Zenon A Perez

Minerva Perez

Lupita Trevino

P E T I T I O N

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Address:

Name:

P.O. Box 2012
P.O. Box 201

Juan Hira

Javier Hira

Box 19 Bruni, TX 78344

Juan Alvarado

Box 243 Bruni, Tx 78344

Amanda Lee San Miguel

Box 243 Bruni, Tx 78344

Yvette Chopa

P E T I T I O N

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Address:

P.O. Box 58, Bruni, TX

P.O. BOX 21 Bruni, TX

P.O. Box 49 Bruni, TX

P.O. Box 66 Bruni, TX

P.O. Box 66 Bruni, TX

Name:

Kasey Black

Ashiana Soto

Mrs. M. Cremon

Lizette Muñoz

Daniel Salas

P E T I T I O N

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Address:

P.O. Box 202
Box 66 Bruni, Tx.
P.O. Box 26 Bruni, Tx.
P.O. Box 18, Bruni, TX
P.O. Box 18, Bruni Tx.
P.O. Box 18, Bruni Tx.
P.O. Box 18, BRUNI, Tx

Name:

Fedoff Almaraz Jr
Cindy C. Phung
Vanessa D. Lopez
Bonnie Chapa
Stephanie Chapa
Thomas Chapa Jr

P E T I T I O N

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Address:

P.O. Box 61 Bruni TX 78344

P.O. Box 143 Bruni TX 78344

Mrs. Maria Guin R. Agas

P.O. Box 92 Bruni, TX

Mrs. Willie Keys

Box 93

Bruni, Texas 78344

Name:

Mr & Mrs. Rex Littlejohn

Howard Dyer

Mrs. C. L. L.

Willie Keys
Box 93 - Bruni, Tex.

PETITION

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Address:

P.O. Box 46 - Bruni
P.O. Box 10 - ST. RT. Bruni Tex.
P.O. Box 63

Emil K. LaRue

Name:

Mariosa Morales
JUAN Ramirez
Laura Vazquez
P.O. Box 42 Bruni 7834

P E T I T I O N

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Address:

P.O. Box 173 Bruni Tx 78344

P.O. Box 173 Bruni, Tx 78344

P.O. Box 223 Bruni, Tx 78344

P.O. Box 223 Bruni, Tx 78344

11

11

11

Name:

Jaime Vasquez

Clara R

Carmen Carrizosa

Dora J. Carrizosa

Dora J. Carrizosa

PETITION

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Address:

P.O. Box 87
Bruni, Tx 78344
P.O. Box 150
Bruni, Tx 78344
P.O. Box 115
Orlton Tx 78371
P.O. Box 17 Bruni Tx 78433
P.O. Box 123 Bruni Tx 78433

Name:

Ruben Aguilar
Sandra Jann
Ben Tuley
Jose Mendez
Frank Zorn

P E T I T I O N

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Address:

400 ave C
Bruni Tex 78344
Bruni Texas 78344

P.O. Box 43 Bruni TX

P.O. Box 43 Bruni TX 78344

Ave D #2050

BRUNI TX 78344

Box 130

Name:

Celando M. Perez

Pola Perez

Betty Sany

Janie Saenz

Larry Lowe

P E T I T I O N

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Address:

1 P.O. Box 6 Bruni, Texas

1 P.O. Box 6 Bruni, Texas
1207 AVE. G

1 P.O. Box 30 Bruni Tx
Ave D 4th Street

1 _____

1 P.O. Box 246
Bruni, Tx 78344

Name:

Mrs + Mrs Jessie Valdez

Robert C. Bellet

Queen A. Sol

Hilda Flores

Sandra Castle

P E T I T I O N

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Address:

Name:

P.O. Box 153 Bruni Tx. 78344

Oscar Chaps Jr.

At P.O. 124 Bruni, Tex. 78344

P.O. Box 101 Bruni, Tx 78344

Patricia Gonzales

Meriam Perez

P.O. Box 183, Bruni

Mary M. Robertson

P.O. Box 20 Bruni, Tx. 78344

Michelle Garza

P E T I T I O N

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Address:

P.O. Box 92 - Bruni TX 78344

P.O. Box 184 - Bruni, Tex 78344

P.O. Box 193 Bruni, TX 78344

P.O. Box 231 Bruni, Texas 78344

P.O. Box 28 Bruni, TX 78344

Name:

Norma Canales

Mrs. Lisa Anna Davis

Biviana T. Garcia

Angie Davis

Gloria Diana Perez

P E T I T I O N

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Address:

Name:

P.O. Box A Bruni, TX 78344 W. M. Chapman

P.O. Box A
Bruni, Tex. 78344

Betty Chapman

P.O. Box 14 Bruni Tx. 78344

Alvin Cota

P.O. Box 45 Bruni Tx.

Richard Castella

P.O. Box 40 Bruni Tx
78344

Dorinda Chapman

PETITION

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Address:

Name:

✓ A.C.F. P.O. Box 9 Bruni TX 78344

Manuela M. Laurel

* P.O. Box 68 Bruni TX 78344

P.O. Box 10

Ana Maria Sandoz

Bruni, Tx 78344

Luciano W.D.

P.O. Box 24 Bruni TX 78344

Jose L. Gonzalez Jr.

P.O. Box 26 Bruni TX 78344

Lupe T. Gonzalez

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Address:

P.O. Box 9 Bruni TX 78433
Juana A. Laurel
Joe Davila Jr.
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